

4.4.3 COMMUNICATION

THE NATURE AND PURPOSE OF COMMUNICATION

True communication is designed to achieve a mutual understanding of the meaning of the message (information, ideas, opinions, feelings) that each person intends to convey, in exactly the way they want the message to be received. Communication is an active, not a passive, endeavour, involving a sequence of exchanges between participants:

1. Message from sender to receiver
2. Paraphrase of message heard by receiver back to sender
3. Clarification by sender to receiver
4. Rephrasing by receiver back to sender
5. Confirmation from sender to receiver that message has been understood, or repeat Step 4 until clarity has been achieved.

Based on this description, it should be evident why the following are not true forms of communication, despite the common use of them as if they were effective means to communicate: memoranda, posted notices, e-mails, telephone voice messages, speeches, lectures, written instructions or written information. These are all methods of conveying 'information', but they lack the essential feedback and clarification steps needed for real 'communication'.

ISO 14001 REQUIREMENTS FOR INTERNAL AND EXTERNAL COMMUNICATION

Effective communication is an essential foundation of an EMS. Communicating relevant information about the EMS means sharing the power for implementing, maintaining, and improving the EMS. Informed and knowledgeable employees can be active participants in the EMS. Conversely, when communications are inadequate and information is missing, an EMS is weakened.

ISO 14001 4.4.3 COMMUNICATION says:

With regard to its environmental aspects and environmental management system, the organization shall establish and maintain procedures for:

- (a) internal communication between the various levels and functions of the organization; and
- (b) receiving, documenting, and responding to relevant communication from external interested parties.

The organization shall consider processes for external communication on its significant environmental aspects, and record its decision.

Internal Communication

ISO 14001 mandates that there be clearly-defined procedures for communicating about the EMS within and between the various levels of responsibility, and within and between different functions (i.e., departments, areas of operation) in the organization. There are many basic reasons for such communications; for example:

- To demonstrate management commitment to protecting the environment, preventing pollution, compliance with laws and regulations, and continual improvement of the EMS
- To motivate employees to do likewise
- To respond to concerns about environmental aspects and their impacts
- To raise awareness about the environmental policy, objectives and targets, operating procedures, and the EMS
- To improve understanding by internal and external interested parties about the EMS and the organization's environmental performance.

Some specific and practical requirements for internal communications in ISO 14001 are:

- Environmental policy
- Legal and other requirements
- Significant environmental aspects and impacts
- Environmental objectives and targets
- Changes to activities, products, or services that affect environmental management programs

- Roles and responsibilities in the EMS
- Training, awareness, and competence requirements
- Operating and document control procedures that may affect the environment
- Emergency preparedness and response actions
- Requirements for, and results of, monitoring and measurement
- Environmental incidents
- Non-compliance with laws and regulations
- Non-conformance with the requirements of the EMS
- Corrective and preventive actions and follow-up to ensure effectiveness
- Results of environmental audits
- Information on the EMS to top management
- Results of management reviews of the EMS
- Effectiveness of the EMS.

In other words, every element of ISO 14001 has a need for communication associated with it. There are many ways to convey information about these topics. But note that none of the following truly qualify as 'communication' unless there is a feedback loop between each of the intended recipients and the sender to confirm understanding:

- Displaying information on notice boards or other postings
- Articles and notices in the company newsletter, bulletins, memos

- Notices in pay packets
- Verbal or written information in management, supervisor, and work crew meetings
- Messages on the organisation's Intranet
- E-mail messages.

Communication with External Interested Parties

According to ISO 14001, an organization must be open to receiving communications about their EMS, or environmental issues in general, from individuals, groups, agencies, and other organizations outside itself. All such communications should be documented (i.e., written down), recorded (i.e., filed for future reference), and responded to promptly and appropriately.

In the world of ISO 14001, no organization is an island. All must be willing to share information about their EMS and environmental aspects, when requested. Companies that do so voluntarily before being asked by external stakeholders are more likely to gain public confidence and support. ISO 14001 steers organizations towards full participative membership in the communities and cultures in which they operate.

External interested parties with whom communication is possible include:

- Individuals
- Ethnic tribes
- National, regional/provincial, and local government and community officials
- Local fishers, farmers, loggers, foresters
- Customers of the organization
- Suppliers of equipment, materials, and services to the organization
- Public interest groups
- Tourism representatives, tourists, recreation interests, property and land owners
- Business associations
- Environmental and other non government organizations (NGO)
- University, college, and school students and teachers
- Community associations
- Representatives of the news media – television, newspapers, radio.

All are worthy of attention by an organization with ISO 14001 aspirations, and should be kept informed of items such as:

- The environmental policy, significant environmental aspects and impacts, and environmental objectives and targets
- Environmental performance in comparison with regulatory requirements, i.e., compliance status
- Emergency preparedness and response plans for local communities
- New pollution control installations at the facility
- Environmental monitoring and measurement programs
- Contact persons in the organization for complaints, concerns, and enquiries.

Communication with external interested parties is even more challenging than internal

communications, but the efforts are well worthwhile in terms of public confidence, image, and the reputation of the organization. Some avenues that can be used to convey information externally are:

- The organization's annual environmental report
- Reports to government on compliance and other matters
- Company newsletter
- Industry association bulletins
- Articles in the news media and interviews with company personnel
- Advertisements
- Facility open days, site tours
- Community meetings
- A 'hot-line' telephone number for complaints
- Organisation Internet website.

Note once more that none of these media are forms of communication unless there is opportunity for both parties to provide feedback and assurance of their understanding. Done properly, communication can be a beautiful garden; done poorly it is a field of thorns.

SUMMARY OF KEY POINTS

- Communication is a two-way cyclic process that results in mutual understanding.
- Unless there is real exploration of an issue, there is only the passage of information – or misinformation.
- Effective internal communication is a cornerstone of an EMS.

- ISO 14001 strongly encourages external communication of significant environmental aspects.
- An organization with an ISO 14001 EMS must receive, document, and respond to enquiries, concerns, and complaints from external interested parties.
- External communication on the EMS is the right thing to do.